

September 4, 2024

Via ECF

The Honorable Frederick J. Scullin, Jr.
Senior United States District Court Judge
United States District Court for the
Northern District of New York
100 S. Clinton St.
Syracuse, NY 13261

Re: Joint Status Update Letter by All Parties in
DeAnna LeTray v. Jefferson County et al., Case No. 20-cv-01194

Dear Judge Scullin:

In advance of the telephonic court conference scheduled for tomorrow, Thursday, September 5 at 3:00 p.m. in the above-referenced case, all parties write to update the Court on the status of settlement.

Having reached and finalized a settlement agreement, counsel for the Plaintiff and City of Watertown have signed a proposed Stipulation and Order of Dismissal regarding the Watertown Defendants. Counsel for Jefferson County Defendants signed the proposed Stipulation today, and it was just filed on the docket.

The Plaintiff and Jefferson County Defendants have reached a settlement in principle where they have agreed upon a monetary amount and that Jefferson County will adopt certain policies and training but are still finalizing the language of the policy and settlement agreement. During the last court conference on August 9, the parties agreed to a series of interim deadlines whereby they would exchange written drafts of the proposed policy and settlement agreement to avoid further delay. Specifically, the Plaintiff agreed to provide written feedback on Defendants' proposed policy on Tuesday, August 13, and Jefferson County Defendants agreed to provide written feedback on the policy as well as the settlement agreement on Friday, August 16. Plaintiff further agreed to provide any necessary additional written feedback on Tuesday, August 20, and Defendant agreed to respond with written feedback on Friday, August 24.

On Tuesday, August 13, the Plaintiff provided Jefferson County Defendants with written feedback on the proposed policy. As of the date of this letter, Jefferson County Defendants have not provided any additional written feedback to the Plaintiff on the policy, nor have they provided any feedback at all on the proposed settlement agreement. On Friday, August 16, counsel for Jefferson County informed the Plaintiff they were continuing to discuss the policy redlines and anticipated a response by the

following Tuesday, August 20. Plaintiff received no response, so asked for an update on Wednesday, August 21. On Thursday, August 22, counsel for Jefferson County Defendants informed the Plaintiff she expected to share written feedback on the policy later that day, but she never provided that written feedback. The Plaintiff received no response, so asked for another update on both Friday, August 23 and Tuesday, August 27. Today, counsel for Jefferson County Defendants informed Plaintiff that Defendants are not yet in a position to provide written feedback to the policy.

The Plaintiff believes that tomorrow's conference is necessary to help facilitate a more efficient resolution of this matter with Jefferson County Defendants.

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Respectfully submitted,

/s/ Jessica Perry

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